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March 19, 2020

VIA ECF AND ELECTRONIC MAIL
(FAILLA_NYSDCHAMBERS@NYSD.USCOURTS.GOV)

Honorable Katherine Polk Failla, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Courtroom 618
New York, New York 10007

MEMO ENDORSED

Re: Wells v. The Achievement Network, et al.
Case No. 1:18-CV-06588 (KPF)

Dear Judge Polk Failla:

This firm represents Defendants The Achievement Network Ltd., Kimberly Cockrell, Teimosa Martin and Melinda Spooner ("Defendants") in connection with the above-referenced matter.

We submit this letter pursuant to Rules 2(C) and 2(D) of Your Honor's Individual Practices in Civil Cases for a modification to the briefing schedule set for Defendants' Motion for Summary Judgment in light of the recent COVID-19 pandemic.

The parties conferred in advance regarding the requested adjournment, and Defendants submit the instant request with the consent of Plaintiff. In particular, the parties propose the current briefing schedule be pushed thirty (30) days and modified as follows:

Deadline	Original Date	New Date
Defendants' Motion for Summary Judgment	April 3, 2020	May 4, 2020
Plaintiff's Opposition to Defendants' Motion	May 8, 2020	June 8, 2020
Defendants' Reply in Further Support	May 29, 2020	June 29, 2020

This is Defendants' first request for an extension of time and modification to the briefing schedule set for Defendants' motion for summary judgment. This modified briefing schedule should not impact any other deadlines.

Thank you for your consideration of this matter. Please let us know if you require any additional information.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Tania J. Mistretta

Tania J. Mistretta

cc: All counsel (via ECF and e-mail)

Application GRANTED. The Court hereby extends the briefing schedule for Defendants' proposed summary judgment motion as provided in this letter.

Dated: March 20, 2020
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE